

Fill in this information to identify the case

Debtor 1 Michelle A. Merella

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: WESTERN District of PENNSYLVANIA  
(State)

Case number 19-23519

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: PNC Bank, N.A.

Court claim no. (if known):

Last 4 digits of any number you use to identify the debtor's account: 6717

16

Property address: 127 Dominion Ln

Number Street

West Newton PA 15089-1298

City

State

Zip Code

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

10/17/2024  
MM/DD/YYYY

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding:

(b) \$ \_\_\_\_\_

c. Total. Add lines a and b.

(c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

      /      /        
MM/DD/YYYY

Debtor 1 Michelle A. Merella Case number (if known) 19-23519  
First Name Middle Name Last Name

#### Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

#### Part 5: Sign Here

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box.

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.**

**X** /s/Stephen R. Franks Date 02/24/2025  
Signature

Print: Stephen R. Franks Title Attorneys for Creditor

Company MDK Legal

Address P.O. Box 165028  
Number Street

Columbus, OH 43216-5028  
City State ZIP Code

Contact phone 614-220-5611 Email amps@manleydeas.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
: **Case No.: 19-23519**  
**Michelle A. Merella** : **Chapter 13**  
: **Judge Gregory L. Taddonio**  
**Debtor(s)** : \* \* \* \* \*  
:   
**PNC Bank, N.A.** : **Related Document #**  
**Movant,** :  
**vs** :  
:   
**Michelle A. Merella** :  
**Ronda J. Winnecour** :  
**Respondents.** :  
:

**CERTIFICATE OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on (date) 02/24/2025.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: 02/24/2025

By: /s/Stephen R. Franks  
Signature  
Stephen R. Franks, Esquire  
Typed Name  
P.O. Box 165028, Columbus, OH 43216-5028  
Address  
614-220-5611  
Phone No.  
333394  
List Bar I.D. and State of Admission

Stephen R. Franks, Attorney for Creditor, MDK Legal, P.O. Box 165028, Columbus, OH 43216-5028 (notified by ecf)

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov (notified by ecf)

Ronda J. Winnecour, Chapter 13 Trustee, Suite 3250, USX Tower, 600 Grant Street, Pittsburgh, PA 15219, cmecf@chapter13trusteedpa.com (notified by ecf)

Kenneth Steidl, Attorney for Debtor, Suite 2830 Gulf Tower, 707 Grant Street, Pittsburgh, PA 15219, julie.steidl@steidl-steinberg.com (notified by ecf)

Michelle A. Merella, Debtor, 127 Dominion Lane, West Newton, PA 15089 (notified by regular US Mail)

Westmoreland County Tax Claim Bureau, Party of Interest, 40 N. Pennsylvania Avenue, Suite 109, Greensburg, PA 15601 (notified by regular US Mail)